

June 10, 2009

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Federal-State Joint Board on Universal Service Petition by Cellular Properties, Inc., for Commission Agreement in Redefining the Service Areas of Illinois Consolidated Telephone Company and Wabash Telephone Cooperative, Inc. in the State of Illinois Pursuant to 47 C.F.R. Section 54.207(c), CC Docket No. 96-45*

Dear Ms. Dortch:

On June 8, 2009 I, on behalf of Cellular Properties, Inc. met with Jennifer Schneider, Legal Adviser to Chairman Copps. I presented the attached handouts and explained that the Commission should allow Cellular Properties' redesignation petitions for both Illinois Consolidated Telephone Company and Wasbash Telephone Co. become effective without initiating a further proceeding. Both of these redesignations were expressly approved by the Illinois Commerce Commission, which specifically reviewed and evaluated the potential for creamskimming, and found that the proposed redesignations did not present a danger of creamskimming. In this situation, there is no need for the Commission to "second guess" the ICC, which is much more familiar with these areas, particularly in light of the only minor differences in variation in density between the areas to be served by Cellular Properties and those that would not be served.

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In addition, the fact that the Bureau initiated further proceedings with respect to the Triangle Communications Systems petition (DA-07-3791) and the US Cellular petition for Nebraska (DA 08-130) did not require doing so here. Both those public notices predated the Commission's adoption of the CETC cap. Moreover, the population density ratio of served to unserved areas was significantly higher in Triangle than in areas discussed in either Cellular Properties petition (3.40 persons/square mile for Triangle - Central Montana v. 1.44 for Cellular Properties - Wabash and 1.08 for Cellular Properties - Illinois Consolidated), and US Cellular Nebraska likewise had a higher population density ratio for served to unserved areas (1.80 persons/square mile v. 1.44 for Cellular Properties - Wabash and 1.08 for Cellular Properties - Illinois Consolidated).

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Nakahata", written over a horizontal line.

John T. Nakahata
Counsel to Cellular Properties, Inc.

cc: Jennifer Schneider
Jennifer McKee
Jenny Price
Tom Buckley